

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Matthew Alexander Nielson; J.Z., a Minor
under age 18 by his Parent and Guardian
Michele Stephens; D.M., a Minor under age 18
by her Parent and Guardian Victoria Reed; and
the Freedom From Religion Foundation, Inc.,

Plaintiffs,

v.

School District Five of Lexington and
Richland Counties,

Defendant.

C.A. No. 3:12-cv-01427-CMC

**JOINT MOTION TO SET
DEADLINE TO FILE
STATEMENT OF
STIPULATED FACTS**

COMES NOW, Meredith L. Seibert, Esq., counsel for Defendant, with the consent of Aaron J. Kozloski, Esq., counsel for Plaintiffs, and moves this Honorable Court for an Order setting the deadline for the Parties to file their Joint Statement of Stipulated Facts by **Friday, July 18, 2014**. Counsel is requesting the deadline be set as such based on the parties' conversations with the Court regarding its wish for the parties to stipulate to agreed-upon facts underlying upcoming Motions for Summary Judgment, particularly given that the parties have indicated their belief that any remaining issues may be resolved through said motions. This request does include an extension of other existing briefing deadlines as follows:

1. Renewed cross-motions for summary judgment shall be filed by **Thursday, August 7, 2014**.
2. Responses to cross-motions for summary judgment shall be filed by **Thursday, August 28, 2014**.

We so move:

By: s/ Meredith L. Seibert
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We consent:

By: s/ Aaron J. Kozloski
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July 11, 2014
Columbia, South Carolina